

DANIEL G. ASHBURN, Esq.  
Admitted in Georgia and Israel

August 4, 2021

VIA ECF

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 8/4/2021

ASHBURN LAW OFFICE LLC

ATLANTA, GEORGIA • 404-939-1323

**MEMO ENDORSED**

Hon. Valerie Caproni, U.S. District Judge  
United States District Courthouse  
40 Foley Square, Room 240  
New York, New York 10007

Hon. Robert W. Lehrburger  
U.S. Magistrate Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

Re: *Avrohom Manes, et al. v. JPMorgan Chase Bank, N.A., et al.*  
SDNY No. 1:20-cv-11059-VEC

Dear Judge Caproni and Magistrate Judge Lehrburger,

I represent Plaintiff Avrohom Manes in this case. I am writing to request a stay of thirty (30) days in the above-referenced case.

This case is currently pending before Judge Caproni on a motion to dismiss filed by Defendant JPMorgan Chase Bank, N.A. ("Chase"), and before Magistrate Judge Lehrburger by referral for a settlement conference with Defendant Trans Union, LLC ("Trans Union").

Unfortunately, undersigned counsel for Plaintiff has recently had to deal with a serious family illness. Last week, counsel for Plaintiff requested and was granted a one-week extension to respond to Defendant Chase's motion to dismiss. However, the family illness has worsened and become unstable. Counsel for Plaintiff has consulted with his client and must respectfully request an emergency stay of thirty (30) days of this action to attend to his family. Counsel for Defendants have graciously consented to this request.

Thank you for your consideration.

Sincerely,

s/Daniel G. Ashburn

Daniel G. Ashburn, Esq.

Cc: Counsel of Record (via ECF)

Application GRANTED in part and DENIED in part. The Court will not stay the case. Plaintiff's opposition to Defendant's motion to dismiss is due **September 17, 2021**. Defendant's reply is due **October 1, 2021**.

SO ORDERED.



HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE